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Before the  
Federal Communications Commission  
Washington, D.C. 20554

MAR 27 2009

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In the Matter of )

NATIONAL GMDSS IMPLEMENTATION )  
TASK FORCE )

WT Docket No. 07-230

Request Regarding Maritime Mobile Service )  
Identities )**ORDER****Adopted: March 17, 2009****Released: March 17, 2009**

By the Deputy Chief, Mobility Division, Wireless Telecommunications Bureau:

1. *Introduction.* In this *Order*, we address a request<sup>1</sup> filed by the National GMDSS Implementation Task Force (GMDSS Task Force).<sup>2</sup> Specifically, the GMDSS Task Force seeks changes to the Commission's processes regarding maritime mobile service identities. On October 11, 2007, the Mobility Division sought comment on the GMDSS Task Force request.<sup>3</sup> Over five hundred comments were received, mostly from individual vessel owners, but also from the United States Coast Guard (USCG), the Radio Technical Commission for Maritime Services (RTCM), and the GMDSS Task Force. For the reasons stated herein, we deny the request as this time, but will consider appropriate action at a later date.

2. *Background.* A maritime mobile service identity (MMSI) is a unique nine-digit number assigned to commercial and recreational vessels participating in the Global Maritime Distress and Safety System.<sup>4</sup> The Commission assigns MMSIs to licensed vessels as part of the ship station licensing process. Operators of vessels that are not required to obtain an individual ship station license ("exempt" vessels)<sup>5</sup> can obtain MMSIs from designated private registration agents.<sup>6</sup> Exempt vessels with privately-

<sup>1</sup> Petition to Request the FCC to Adopt New Policies and Procedures Regarding MMSI Assignments (filed May 29, 2007) (Request).

<sup>2</sup> The GMDSS Task Force was chartered by the U.S. Coast Guard to supplement government functions in expediting the implementation of the Global Maritime Distress and Safety System. The membership includes over 1,500 representatives of government agencies, commercial vessel owners and operators, recreational vessel interests, training institutions, service agents, manufacturers, trade associations, and maritime labor organizations.

<sup>3</sup> Wireless Telecommunications Bureau Seeks Comment on Request of National GMDSS Implementation Task Force Regarding Maritime Mobile Service Identities, *Public Notice*, 22 FCC Rcd 18383 (WTB MD 2007).

<sup>4</sup> See, e.g., Amendment of the Commission's Rules Regarding Maritime Automatic Identification Systems, *Report and Order and Further Notice of Proposed Rule Making and Fourth Memorandum Opinion and Order*, WT Docket No. 04-344, 21 FCC Rcd 8892, 8936 n.307 (2006).

<sup>5</sup> A vessel is not required to be individually licensed if it is not subject to any radio equipment carriage requirement under any statute, treaty, or agreement to which the United States is a party; does not travel to foreign ports or make international communications; and does not carry equipment other than VHF (156-162 MHz) radios, emergency position-indicating radio beacons, and radar installations. See 47 C.F.R. § 80.13(c).

<sup>6</sup> See Commission Announces Agreements with Shine Micro, Inc., and United States Power Squadrons, Inc., and Termination of Agreement with Maritel, Inc., Regarding Assignment of Maritime Mobile Service Identities (MMSIs), *Public Notice*, 22 FCC Rcd 7329, 7330 (WTB MD 2007) (listing entities from which operators of exempt vessels can obtain MMSIs).

issued MMISIs that later obtain individual ship station licenses receive new MMISIs in the licensing process. Vessel owners that allow their licenses to expire (because they are no longer required to be individually licensed) do not retain their Commission-issued MMSI, and must obtain new privately-issued MMISIs.

3. The GMDSS Task Force requests that the Commission alter its Universal Licensing System (ULS) so as to permit operators of exempt vessels that later obtain individual ship station licenses issued by the Commission to retain the privately-issued MMSI.<sup>7</sup> It also recommends that the designated private entities be permitted to manage Commission-issued MMISIs when the operator of a licensed vessel decides not to renew the station license.<sup>8</sup> The GMDSS Task Force argues that this would alleviate a burden on operators by eliminating the need to have the new MMSI programmed into their shipboard equipment, and prevent the same vessel from being assigned two MMISIs concurrently, which wastes numbers.<sup>9</sup>

4. Commenters support these proposals. In addition to reiterating concerns expressed by the GMDSS Task Force, they express frustration that upon receipt of a new Commission-issued MMSI, in many instances, the radio equipment must be removed from the vessel and sent to the manufacturer for reprogramming at the vessel owner's expense.<sup>10</sup> Such reprogramming might take several weeks or months, resulting in travel delays or travel without properly registered radio equipment on board.<sup>11</sup> Some commenters believe that the burden associated with obtaining a new MMSI deters some vessel owners from complying with the individual licensing requirement, or from obtaining a new MMSI after allowing the vessel's license to expire.<sup>12</sup>

5. Previously, the GMDSS Task Force requested that the Commission to expand its MMSI database to incorporate additional data fields by revising the Commission's application forms to require submission of the expanded data when applying for a station license and when renewing such licenses.<sup>13</sup> In 2003, the Wireless Telecommunications Bureau, Public Safety and Private Wireless Division<sup>14</sup> granted the request to the extent of adding the additional data fields to the application form for new ship station licenses.<sup>15</sup> The additional information is not, however, required of licensees renewing ship station

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<sup>7</sup> Request at 4.

<sup>8</sup> See *id.* at 4-5.

<sup>9</sup> See *id.* at 2-3.

<sup>10</sup> See, e.g., RTCM Comments at 2; Christian David Rhynalds Comments at 1; Richard Galasso Comments at 1.

<sup>11</sup> See, e.g., Preston Bateman Comments at 1; Edward Jemerich Comments at 1; James Griffing Comments at 1.

<sup>12</sup> See, e.g., James Hagy Comments at 1; Richard H. Schuman III Comments at 1.

<sup>13</sup> See Wireless Telecommunications Bureau Seeks Comment on Request that the Commission Collect Full Maritime Mobile Service Identity Data Set Recommended by the International Maritime Organization, *Public Notice*, 17 FCC Rcd 26114, 26114 (WTB PSPWD 2002).

<sup>14</sup> The Commission reorganized the Wireless Telecommunications Bureau effective November 13, 2003, and the Public Safety and Critical Infrastructure Division assumed the relevant duties of the Public Safety and Private Wireless Division. See Reorganization of the Wireless Telecommunications Bureau, *Order*, 18 FCC Rcd 25414, 25414 ¶ 2 (2003). Pursuant to a reorganization effective September 25, 2006, certain duties of the Public Safety and Critical Infrastructure Division were assumed by the Mobility Division. See Establishment of the Public Safety and Homeland Security Bureau, *Order*, 21 FCC Rcd 10867 (2006).

<sup>15</sup> See Wireless Telecommunications Bureau Promotes Increased Maritime Safety by Expanding Collection of Maritime Mobile Service Information, *Public Notice*, 18 FCC Rcd 10165, 10165-66 (WTB PSPWD 2003) (adding data fields for name, address, telephone number, and fax number for emergency contact person ashore; emergency contact number for alternate contact ashore; radio installation for ship and survival craft; emergency position-

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licenses that were initially granted before the additional data fields were added to the form.<sup>16</sup> In the instant request, the GMDSS Task Force again recommends that the Commission require licensees to provide the expanded data when they apply for license renewal, and further recommends that the Commission periodically contact licensees and other MMSI registrants to verify that the data on file remains correct, and that the MMSI is still active.<sup>17</sup>

6. USCG strongly supports these proposals. It states that the additional information helps to identify the entity transmitting the distress signal,<sup>18</sup> and to determine whether the distress call is genuine, thus resulting in efficient and effective allocations of resources.<sup>19</sup>

7. *Discussion.* We agree with the commenters that there is merit to the GMDSS Task Force's proposals. It appears that permitting exempt vessels with privately-issued MMSI numbers to retain these MMSIs when they later obtain a Commission-issued individual ship station licenses, and permitting the designated private entities be permitted to manage Commission-issued MMSIs when the operator of a licensed vessel decides not to renew the station license, would be more efficient than maintaining the current wasteful system of dual MMSIs, and would eliminate unnecessary paperwork, expense, and delay. It also could improve the safety of individual vessel owners as it would minimize the incidence of travel without properly-registered MMSIs.

8. We also agree that it would be beneficial to require licensees to update their information in the licensing system and provide additional data when their ship station licenses are renewed. We do not think, however, that the Commission should be required to periodically verify the information in the database by contacting individual licensees, as there is no evidence in the record that outdated information in the licensing system poses any problems to the Commission, licensees, or entities that rely on the accuracy of such information.

9. Therefore, we agree that our licensing system should be altered so that it would accept the entry of a privately-issued MMSI and process an individual ship station license application, without automatically issuing a new MMSI number. We, however, do not think it necessary to alter the current system immediately and only for this sole purpose, because such alteration would require substantial and costly reprogramming. Such reprogramming should be done in conjunction with the forthcoming upgrade of the licensing system. We therefore intend to consider the proposal described in the GMDSS petition in more detail at the time when the upgrade is scheduled. All technical and administrative matters in connection with the proposal and all other related matters will be addressed then.

10. *Ordering Clause.* Accordingly, IT IS ORDERED that, pursuant to Sections 4(i) of the Communications Act of 1934, as amended, 47 U.S.C. § 154(i), and Section 1.41 of the Commission's Rules, 47 C.F.R. § 1.41, the Petition to Request the FCC to Adopt New Policies and Procedures Regarding MMSI Assignments filed on May 29, 2007, by the National GMDSS Implementation Task Force IS DENIED.

11. This action is taken under delegated authority pursuant to Section 0.131 and 0.331 of the

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indicating radiobeacon identification code and homing frequency; type and number of survival craft; and capacity for persons on board).

<sup>16</sup> See FCC Form 605 Main Form Instructions at 5 (requiring radio service code, application purpose, call sign, FCC Registration Number, and fee information to renew a license).

<sup>17</sup> See Request at 3-4.

<sup>18</sup> USCG Comments at 2.

<sup>19</sup> *Id.* at 3.

Commission's Rules, 47 C.F.R. §§ 0.131, 0.331.

FEDERAL COMMUNICATIONS COMMISSION

A handwritten signature in black ink, appearing to read 'St Stone', is written over a horizontal line.

Scot Stone  
Deputy Chief, Mobility Division  
Wireless Telecommunications Bureau